

MEMO ENDORSED

Federal Defenders OF NEW YORK, INC.

Southern District
81 Main Street, Suite 300
White Plains, N.Y. 10601-4150
Tel: (914) 428-7124 Fax: (914) 948-5109

David E. Patton
*Executive Director
and Attorney-in-Chief*

*Southern District of New York
Jennifer L. Brown
Attorney-in-Charge*

July 29, 2021

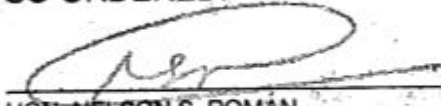
BY ECF

The Honorable Judge Nelson S. Roman
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Deft's request to modify her bail conditions as outlined below is granted without objection by the Gov't and her Pretrial Services Officer. Clerk of Court requested to terminate the motion (doc. 41).
Dated: July 29, 2021

**Re: United States v. Vania Bell
19 Cr. 550 (NSR)**

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Dear Judge Roman:

I am writing on behalf of Ms. Vania Bell to respectfully request that Your Honor please modify Ms. Bell's bail conditions to allow her to travel to Skaneateles, New York. Specifically, Ms. Bell requests that the Court allow her to drive her daughter to the camp so that she may serve as a CIT at Lourdes Camp (1150 10 Mile Point Rd, Skaneateles, NY 13152). The sessions will take place on two non-consecutive weeks: August 1st through August 6, 2021, and August 15th through August 20, 2021.

For the first training period, Ms. Bell will travel to the campsite on Saturday, July 31, 2021, around 6:30 PM. She will spend the night with her daughter at the Ecno Lodge (10 Church Street, Cortland, NY 13045). On the morning of August 1, 2021, after she drops her daughter off, Ms. Bell will return to her New Jersey residence (26 Walnut Street, Montvale, New Jersey). At the conclusion of this first training period, specifically on Friday August 6, 2021, Ms. Bell will leave her New Jersey resident around 7:00 AM to pickup her daughter from the camp and bring her home. Because the drive is about eight hours, round trip, Mr. Bell expects to get home around 8:00 PM on August 6, 2021.

For the second period of training (August 15 – August 20, 2021), Ms. Bell will follow the same schedule as before: Leave her residence on August 14, 2021 at 6:30 PM with her daughter, spend the night at Ecno Lodge and drive back to New Jersey on August 15, 2021. At the conclusion of the second training period, specifically on August 20, 2021, Ms. Bell will leave her residence around 7:00 AM and return home with her daughter around 8:00 PM.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 7/29/2021

As background, on August 1, 2019, Ms. Bell was released on bond. She is currently on pretrial supervision. Her pretrial service officer, Mr. Winter Pascual, and the government have no objection to this travel request. Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Ben Gold
Assistant Federal Defender
(914) 458-8128

cc: Margery Beth Feizing, AUSA
Vladislav Vainberg, AUSA
Winter Pascual, USPTSO
Ms. Vania Bell